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**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

RONNIE T. JEFFREY,

Plaintiff,

v.

**THE CITY OF NEW YORK and NYPD
Officers JOHN DOES 1 through 10,
individually and in their official
capacities (the names John and Jane Doe
being fictitious, as the true names are
presently unknown).**

Defendants.

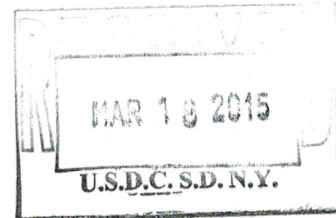
15 CV 2053

Complaint

JURY TRIAL DEMANDED

Civ. No.:

JUDGE DANIELS



PRELIMINARY STATEMENT

1. Plaintiff brings this civil rights action against the City of New York and New York City Police Officers John Does 1 through 10, alleging that defendants violated his rights under 42 U.S.C. § 1983, the Fourth, Fifth and Fourteenth Amendments to the United States Constitution by falsely arresting him, denying him a fair trial and maliciously prosecuting him. Plaintiff seeks compensatory and punitive damages, attorney's fees and costs and such other and further relief as the Court deems just and proper.

JURISDICTION AND VENUE

2. This action is brought pursuant to 42 U.S.C. §§1983 and 1988, and the Fourth and Sixth & Fourteenth Amendments to the United States Constitution. Jurisdiction is conferred upon this Court by 28 U.S.C. §1331 and §1343.
3. Venue is proper in the Southern District of New York pursuant to 28 U.S.C. §1391 (b) and (c) because a substantial part of the events giving rise to Plaintiff's claims occurred in this District and because some or all of the defendants reside in this District.

DEMAND FOR A JURY TRIAL

4. Pursuant to Fed. R. Civ. P. 38, Plaintiff demands a trial by jury in this action.

PARTIES

5. Plaintiff Ronnie T. Jeffrey ("Plaintiff" or "Mr. Jeffrey") is a United States citizen who resides in the County Bronx, in the City and State of New York.
6. Plaintiff Ronnie T. Jeffrey is an African American man who is thirty-three (33) years of age and does not have a criminal record.
7. The City of New York is a municipal corporation organized under the laws of the State of New York.
8. The individual defendants are members of the New York City Police Department ("NYPD") who were so employed on September 20, 2014. The defendants were acting under color of state law and in their capacities as members of the NYPD at all relevant times. The defendants are sued in their individual and official capacities.

STATEMENT OF FACTS

9. At or about 12:30 AM on September 20, 2014, Plaintiff was lawfully present outside, and on the steps of a friend's apartment building.
10. Two NYPD officers then approached Plaintiff and instructed him to "get off the steps" of his friend's apartment building.
11. Plaintiff calmly explained to the officers that he had just gotten there, but rather than start a confrontation, Plaintiff began to walk away, by himself.
12. Next, Plaintiff heard someone scream out an obscenity, although it was not Plaintiff that screamed out.
13. One of the NYPD officers approached Plaintiff and queried, "What did you say to me?"
14. Plaintiff denied that he said or screamed anything, but was handcuffed nonetheless.
15. Plaintiff was transported to the 42nd Precinct where he spent approximately four (4) hours before he was given a pink summons for Disorderly Conduct and released.
16. Thereafter, Plaintiff went to Bronx County Criminal Court twice, and on his second appearance a bench trial was held.
17. At the bench trial, Plaintiff was acquitted and the violation charge levied against him was dismissed in the entirety.
18. Plaintiff suffered damage as a result of defendants' actions. Plaintiff suffered an unlawful detention, loss of liberty, emotional distress, fear, anxiety, humiliation, degradation, embarrassment and damage to his reputation.

FIRST CLAIM
Unlawful Stop and Search

19. Plaintiff repeats and realleges each and every allegation as if fully set forth herein.